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VIA ECF

The Honorable Philip M. Halpern
United States District Judge
United States District Court for the Southern District of New York
300 Quarropas St.
White Plains, NY 10601

Re: Chun-Ko Chang. v. Shen Yun Performing Arts, Inc., et al. Case No. 24-cv-8980

Dear Judge Halpern:

We write on behalf of Defendant International Bank of Chicago in the above-captioned matter to respectfully request an extension of time to respond to Plaintiff's complaint. The original deadline is December 31, 2024, and Defendant International Bank of Chicago requests an extension until January 21, 2025. We are requesting this extension to allow for sufficient time to exchange the first set of letters required by your Honor's Individual Rule 4.C., which exchange must be completed before the parties submit any pre-motion letter with respect to a Motion to Dismiss. This is the first request by Defendant International Bank of Chicago for any adjournment or extension of such deadline. Plaintiff consents to the extension request.

Thank you for your consideration of this matter.

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